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AUSA Anjali Prasad; 313-226-9589

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent Angela Potter, HSI

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Emmanuel Gyamfi

Case:2:13-mj-30013

Judge: Unassigned,

Filed: 01-09-2013 At 12:09 PM

CMP USA V GYAMFI (LCB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 8, 2013 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

21 U.S.C. Section 952

21 U.S.C. Section 841(a)(1)

*Offense Description*

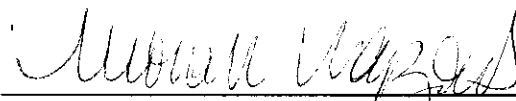
Knowingly, and unlawfully attempted to import into the United States, Heroin,  
a Schedule 1 controlled substance; and possession with intent to distribute a  
controlled substance.

This criminal complaint is based on these facts:

SEE ATTACHED COMPLAINT

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 1/9/13City and state: Detroit, Michigan*Complainant's signature*Angela M. Potter, Special Agent, H.S.I.*Printed name and title**Judge's signature*Mona K. Majzoub, United States Magistrate Judge*Printed name and title*

### AFFIDAVIT

I, Angela M. Potter, being duly sworn, depose and state:

1. I am a Special Agent with the Homeland Security Investigations, having been so designated since June 2006. From March of 1998 until my appointment as a Special Agent, I performed uniformed law enforcement duties as an United States Customs Inspector and Federal Air Marshal. During my career as a law enforcement officer, I have been involved in various investigations concerning narcotics smuggling and have received training in this area. The following is based on my investigation as well as statements from other law enforcement officers and individuals.
2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that Emmanuel GYAMFI did knowingly and unlawfully attempt to import into the United States approximately 1.8 kilograms of heroin, a Schedule I controlled substance (all in violation of Title 21, United States Code, Sections 952) and did possess with the intent to distribute a controlled substance (all in violation of Title 21, United States Code, Section 841(a)(1), and therefore does not contain all the facts known to your Affiant.
3. On January 8, 2013 at approximately 1108 GYAMFI arrived at the Detroit Metro Airport onboard Delta flight 251 from Ghana via Amsterdam. GYAMFI was referred by Customs and Border Protection Officers (CBPO) for a secondary baggage inspection due to peculiar body language, profuse sweating and nervous behavior.
4. GYAMFI, who was in possession of a black duffel carryon bag, was escorted to the baggage belt where he took possession of one soft sided roller bag suitcase with an affixed airline baggage tag bearing the name Emmanuel GYAMFI. GYAMFI claimed ownership of both bags.
5. During the baggage exam, GYAMFI, again stated that both suitcases were owned by him. CBPO's emptied the soft sided roller bag and noticed that it felt unusually heavy. CBPO's conducted an x-ray examination of the soft sided roller bag. During this examination an anomaly was discovered in a false side of the bag.
6. CBPO's asked GYAMFI what was in the suitcase and he stated he did not know what would be there. He stated that his wife bought the suitcase off a stranger on the street a few weeks ago.

7. CBPO's removed the anomaly from the suitcase and cut a small slit in the fabric revealing a brown powdery substance which field tested positive for the presence of heroin.
8. Based on the above described information, there is probable cause that GYAMFI did knowingly and unlawfully attempt to import into the United States approximately 1.8 kilograms of heroin, a Schedule I controlled substance (all in violation of Title 21, United States Code, Sections 952) and did possess with the intent to distribute a controlled substance (all in violation of Title 21, United States Code, Section 841(a)(1)).



Angela M. Potter  
Special Agent,  
Homeland Security Investigations

Subscribed and sworn to before me  
This 9<sup>th</sup> day of January, 2013



Mona K. Majzoub  
United States Magistrate Judge